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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CHARLENE SCOTT,
14 Defendant.

Case No. 2:15-cr-00174-KJD-BNW-4

**Stipulation to Continue Supplement's
Deadline to Motion for
Compassionate Release
(Third Request)**

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Madeline
20 S. Lal, Assistant Federal Public Defender, counsel for Charlene Scott, request that the due date
21 for Ms. Scott's Supplement to Motion for Compassionate Release (ECF No. 461), be extended
22 from April 23, 2024, to May 7, 2024; and that the due date for the government's response be
23 extended until May 21, 2024.

24 This Stipulation is entered into for the following reasons:

25 1. On January 4, 2024, Ms. Scott filed a motion seeking an order reducing her
26 sentence or modifying her judgment under the compassionate release statute at 18 U.S.C. §§
3582(c) and 3553(a). ECF No. 461.

1 2. Defense counsel needs additional time to investigate Ms. Scott's personal and
2 family medical issues, which are pertinent to the supplement.

3 3. The additional time requested by the stipulation is made in good faith and not
4 for purposes of delay.

5 4. The defendant is in custody and agrees with the need for a continuance.

6 5. The parties agree to the continuance.

7 This is the third request for a continuance of the supplement deadline.

8 DATED this 22nd day of April, 2024.

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10 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

12 By /s/ Madeline S. Lal
13 MADELINE S. LAL
14 Assistant Federal Public Defender

By /s/ Kimberly M. Frayn
KIMBERLY M. FRAYN
15 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHARLENE SCOTT,
Defendant.

Case No. 2:15-cr-00174-KJD-BNW-4

ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to Extend Deadline for filing her Supplement to Motion for Compassionate Release, that the Defendant's deadline to file his Supplement is extended to May 7, 2024; and that the Government's deadline to file its response is extended to May 21, 2024.

DATED this 22 day of April, 2024.

UNITED STATES DISTRICT JUDGE